

Boston University

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EXHIBIT "B"

By Fax (617) 965-5020 and Federal Express

Ben Tariri, Esq.
343 Washington Street
Newton, Massachusetts 02458

Re: Layla Kiani v. Trustees of Boston University, et al.
(U.S. District Court, C.A. No. 04-CV-11838-PBS)

Dear Ben:

I am writing in response to your letter of April 26, regarding discovery in the above-referenced case.

An abbreviated chronology will put your request in perspective. On October 18, 2004, Judge Saris set the discovery and motion schedule for this case. You did not mail me your interrogatories and document request until February 7, 2005, nearly four months after the discovery conference. With your assent, I answered interrogatories and produced documents on April 1. Now, less than one week prior to the close of discovery, you claim to be dissatisfied with the University's responses to your discovery requests.

At the outset, it is worth noting the narrow confines of this case. It involves one individual's claim that the University breached a contract when it allegedly failed to inform Ms. Kiani that she had the right to remain silent prior to her disciplinary hearing. The other remaining claims, under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, allege that Ms. Kiani was denied accommodations.

I will address the particulars of Interrogatories 10, 11, 12, 14, 16, 21, and 22. I will then turn to the document requests you have identified.

Interrogatory No. 10: This interrogatory is grossly burdensome. Neither the ADA nor the Rehabilitation Act existed in 1960. This case is about one student, not "all handicapped students and employees." It is not a class action. There is absolutely no relevance to the number of disabled students "within each department of the University."

Interrogatory No. 12: This case involves the plagiarism of Layla Kiani. It does not involve "each student or employee or faculty member who has been accused of plagiarism [between 1940 and 2004]. . . ." The information you seek has no conceivable relevance to the